IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION

Kevin Turner and Shawn Wooden, on behalf of themselves and others similarly situated,

Plaintiffs, and

Richard Dent, Jeremy Newberry, Roy Green, J.D. Hill, Keith Van Horne, Ron Stone, Ron Pritchard, James McMahon, and Marcellus Wiley, on behalf of themselves and others similarly situated,

Proposed Intervenor-Plaintiffs

v.

National Football League and NFL Properties LLC, successor-in-interest to NFL Properties, Inc.

Defendants.

THIS DOCUMENT RELATES TO: ALL ACTIONS

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Civ. Action No. 14-00029-AB

MOTION TO INTERVENE

Pursuant to Federal Rules of Civil Procedure 24(a) and (b), Richard Dent, Jeremy Newberry, Roy Green, J.D. Hill, Keith Van Horne, Ron Stone, Ron Pritchard, James McMahon, and Marcellus Wiley, on behalf of themselves and other similarly situated Plaintiffs in the pending putative class action in the U.S. District Court for the Northern District of California, *Richard Dent, et al. v. National Football League*, Case No. 3:14-cv-02324, hereby move to intervene as intervenor-plaintiffs in the above-captioned matter.

The *Dent* Plaintiffs seek intervention as of right under Fed. R. Civ. P. 24(a)(2) or, alternatively, permissive intervention under Fed. R. Civ. P. 24(b)(1)(B) on the grounds set forth in the accompanying memorandum of law.

Respectfully submitted,

Date: August 12, 2014

/s/

Ramsay M. Whitworth (Fed. Bar No. 85208)

rwhitworth@mdattorney.com

Stephen G. Grygiel (*Pro Hac* Pending)

sgrygiel@mdattorney.com

William N. Sinclair (*Pro Hac* Pending)

bsinclair@mdattorney.com

SILVERMAN|THOMPSON|SLUTKIN|WHITE|LLC

201 North Charles Street, Suite 2600

Baltimore, Maryland 21201

Tel: (410) 385-2225

Fax: (410) 547-2432

Stuart A. Davidson (Pro Hac Pending)

SDavidson@rgrdlaw.com

Mark J. Dearman (*Pro Hac* Pending)

MDearman@rgrdlaw.com

Robbins Geller Rudman & Dowd LLP

120 E. Palmetto Park Road, Suite 500

Boca Raton, Florida 33432

Tel: (561) 750-3000

Fax: (561) 750-3364

Attorneys for Dent Plaintiffs